

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ZENIMAX MEDIA INC. and ID SOFTWARE LLC

Plaintiffs,

v.

**OCULUS VR, LLC, PALMER LUCKEY AND
FACEBOOK, INC.,**

Defendants.

Case No.: 3:14-cv-01849-P

NOTICE REGARDING IN-HOUSE COUNSEL

TO THE HONORABLE COURT:

Defendants Oculus VR, LLC (“Oculus”), Palmer Luckey and Facebook, Inc. (“Facebook”) respectfully respond to the Order (Doc. 222) granting in part Defendants’ Motion to Permit Additional Persons to Access Protected Materials (Doc. 145). Pursuant to that Order, Defendants identify the following attorney for Facebook and Oculus as the in-house counsel who should be allowed to have access to Plaintiffs’ Further Identification of Misappropriated Trade Secrets (Doc. 113-1) at this time:

- Christen Dubois, Facebook’s Director and Associate General Counsel, IP

Ms. Dubois bears direct responsibility for overseeing the litigation of this case, evaluating the merits of Plaintiffs’ claims, and day-to-day oversight of the case and the activities of outside counsel. Ms. Dubois needs access to Plaintiffs’ Further Identification of Misappropriated Trade Secrets in order to fully understand the nature of Plaintiffs’ claims in the case. None of her job responsibilities includes any participation in the development of Defendants’ technologies, so allowing her to have access to Plaintiffs’ explanation of their trade secrets will not create any risk

that the information will, intentionally or unintentionally, become incorporated in any of Defendants' products. Additionally, Ms. Dubois is prepared to execute the Undertaking required by the Court's Protective Order (Doc. 107), which obligates her to comply with all applicable protections for the information at issue and subjects her to the ongoing supervision and authority of this Court.

Defendants believe that it may become reasonably necessary for one or more additional in-house attorneys for Oculus and Facebook to be granted access to Plaintiffs' Further Identification of Misappropriated Trade Secrets as the litigation proceeds. Accordingly, Defendants request that the Court allow them to submit additional notice for any such attorneys at a later date.

Date: October 20, 2015

Respectfully submitted,

/s/ Richard A. Smith

Richard A. Smith
Texas Bar No. 24027990
rsmith@lynnllp.com
Elizabeth Y. Ryan
Texas Bar No. 24067758
eryan@lynnllp.com
LYNN TILLOTSON PINKER & COX LLP
2100 Ross Avenue, Suite 2700
Dallas, Texas 75201
Phone: (214) 981-3800
Fax: (214) 981-3839

Michael G. Rhodes (*pro hac vice*)
mrhodes@cooley.com
COOLEY LLP
101 California St., 5th Floor
San Francisco, California 94111
Phone: (415) 693-2000

Heidi L. Keefe (*pro hac vice*)
hleefe@cooley.com
Mark R. Weinstein (*pro hac vice*)
mweinstein@cooley.com
COOLEY LLP
3175 Hanover Street
Palo Alto, CA 94304
Phone: (650) 843-5000

CERTIFICATE OF SERVICE

On October 20, 2015, I hereby certify that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). I hereby certify that I have served all counsel who are deemed to have consented to electronic service or by another manner authorized by Federal Rules of Civil Procedure 5(b)(2).

/s/ Richard A. Smith
Richard A. Smith

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